Exhibit 2

AFFIDAVIT OF FRED T. HEINRITZ

STATE OF WISCONSIN) COUNTY OF OUTAGAMIE)
I, Fred T. Heinritz, resident of Appleton, Wisconsin, first being duly sworn upon oath,
state as follows:
I am currently 86 years old. I began work at the Appleton Coated Paper Company in
1947. I worked as the Purchasing Manager at Appleton Coated Paper Co. from approximately
1956 to 1966. I retired from Appleton Papers Inc. in 1987.
I have looked at the attached document, identified by Bates label BCFOX00007067. I do
not recall writing this letter. The way the letter is signed is not how I usually signed letters. I do
not recall anyone at Wiggins Teape named "Sam" or "Burroughs."
I do not recall learning that NCR Paper broke was shipped to Allied Paper or Kimberly
Clark in the 1950s or 1960s. I did know at that time that NCR Paper broke was being purchased
by Bergstrom. I do not recall any other places where NCR Paper broke was shipped.
At my deposition in January 2009, I explained all that I remember about what happened
to NCR Paper broke generated at Appleton Paper Company. Area T. Heinrick Fred T. Heinrick
Subscribed and sworn to before me this May of March, 2010. Notary Public State of Wisconsin My Commission Expires: 8/12/2012 My Commission Expires: 8/12/2012



<u>COPY.</u>



applying coated paper coupling, 825 east miscondin avenue, appleton.

Airmail.

May 19, 1965.

Mr. A.Z. Burroughs, Miggins Toage Research & Development Ltd., London S.E.1. (England).

Doar Can.

I have your letter of May 13 regarding repulping the NCR CB Broke.
Saveral different mills have used limited quantities of our CB Broke.
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Saveral different findling Bergstrom Paper Company, Mosnah, Misconsin.
and Millid Paper Gompany, Kalamacod, Michigan. At prosent to bulleve that the Kimberly-Clark Company, Moraine Wilk in West Carrolton, Ohio
to using the bulk of the CB Broke, and is repulping it very successfully
that the papers are sold through dealers, and, therefore, it is
cost be ware of.

The CB Broke, however, we do not know that it is done by a conventional in-initial process. The Moraine Mill has a batch process and we believe they know developed some special handling means which enable them to easily receyo the CB coating. Confidentially, we can tell you that we receive 2 75.00 per ton for this waste, which is quite high in relation to other waste papers we sell. This compares favourably with other white waste papers we sell and, therefore, they must be removing the coating in a rather simple manner.

It was cortainly nice to hear from you, Sam. If we can be of help on anything class please let us know.

Yours very truly,

(signed) Bud.

Appleton Coated Paper Co.

Fryoinrits.